

HEARING DATE AND TIME: August 6, 2010 at 9:00 a.m. (Eastern Time)
RESPONSE DEADLINE: July 30, 2010 at 4:00 p.m. (Eastern Time)
REPLY DEADLINE: August 1, 2010 at 12:00 p.m. (Eastern Time)

Robert T. Gibson
Pro Hac Vice
THE GIBSON LAW FIRM
Four Penn Center
1600 J.F.K. Boulevard – 5th Floor
Philadelphia, PA 19103
Tel: 215-729-7000
Fax: 215-695-2200

Attorney for Creditors Gibson Law Firm/George and Karen Kairis
(Objectors in *Soders v. General Motors Corp.* class action)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANTY, <i>et al.</i> ,	:	09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i> ,	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

NOTICE OF HEARING ON
OBJECTION TO PROOF OF CLAIM NO. 44887 (AMENDED)

PLEASE TAKE NOTICE that on July 2, 2010, Creditors, George and Karen Kairis and The Gibson Law Firm, filed an Objection to Proof of Claim No. 44887 (Amended) [Docket No. 6264], and that a hearing to consider said Objection will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **August 6, 2010 at 9:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Objection and Petition to Intervene must be in writing, shall conform to the Federal Rules of

Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, DC 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor,

New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); and

(x) Robert Gibson, Esquire, The Gibson Law Firm, Four Penn Center, 1600 J.F.K. Boulevard – 5th Floor, Philadelphia, PA 19103, so as to be received no later than **July 30, 2010 at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that the relief requested may be granted without a hearing if no objection is timely filed and served.

Respectfully submitted,

/s/ Robert T. Gibson

Robert T. Gibson

Pro Hac Vice

THE GIBSON LAW FIRM

Four Penn Center

1600 J.F.K. Boulevard – 5th Floor

Philadelphia, PA 19103

Tel: 215-729-7000

Fax: 215-695-2200

Attorney for Creditors The Gibson Law

Firm/George and Karen Kairis

(Objectors in *Soders v. General Motors Corp.* class action)

Date: July 2, 2010

Robert T. Gibson
Pro Hac Vice
THE GIBSON LAW FIRM
Four Penn Center
1600 J.F.K. Boulevard – 5th Floor
Tel: 215-729-7000
Fax: 215-695-2200

Attorney for Creditors Gibson Law Firm/George and Karen Kairis
(Objectors in *Soders v. General Motors Corp.* class action)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : Chapter 11 Case No.
: :
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)
f/k/a General Motors Corp., *et al.*, :
: :
Debtors. : (Jointly Administered)
:
-----X

CERTIFICATE OF SERVICE

ROBERT T. GIBSON, ESQUIRE, hereby certifies that a true and correct copy of the
foregoing document was served upon the following persons via first-class mail:

Weil, Gotshal & Manges LLP
(Attn: Harvey R. Miller, Esq.,
Stephen Karotkin, Esq.,
Joseph H. Smolinsky, Esq., and
Pablo Falabella, Esq.)
767 Fifth Avenue
New York, New York 10153

General Motors, LLC
(Attn: Lawrence S. Buonomo, Esq.)
300 Renaissance Center
Detroit, Michigan 48265

United States Department of the Treasury
(Attn: Joseph Samarias, Esq.)
1500 Pennsylvania Avenue NW, Room 2312

Motors Liquidation Company
(Attn: Ted Stenger)
500 Renaissance Center, Suite 1400
Detroit, Michigan 48243

Cadwalader, Wickersham & Taft LLP
(Attn: John J. Rapisardi, Esq.)
One World Financial Center
New York, New York 10281

Vedder Price, P.C.
(Attn: Michael J. Edelman, Esq. and
Michael L. Schein, Esq.)
1633 Broadway, 47th Floor
New York, New York 10019

Washington, DC 20220
Kramer Levin Naftalis & Frankel LLP
(Attn: Thomas Moers Mayer, Esq.,
Amy Caton, Esq.,
Lauren Macksoud, Esq., and
Jennifer Sharret, Esq.)
1177 Avenue of the Americas
New York, New York 10036

U.S. Attorney's Office, S.D.N.Y.
(Attn: David S. Jones, Esq. and
Natalie Kuehler, Esq.)
86 Chambers Street, Third Floor,
New York, New York 10007

Carpenter, Lipps & Leland LLP
(Attn: Jeffrey Lipps, Esq.)
280 Plaza, Suite 1300
280 North High Street
Columbus, OH 43215

Office of the United States Trustee
for the Southern District of New York
(Attn: Diana G. Adams, Esq.)
33 Whitehall Street, 21st Floor
New York, New York 10004

RodaNast, P.C.
(Attn: Joseph Roda, Esq. and
Michelle Burkholder, Esq.)
801 Estelle Drive
Lancaster, PA 17601

Hartman, Underhill & Brubaker LLP
(Attn: Christopher Underhill, Esq.)
221 East Chestnut Street
Lancaster, PA 17602

Respectfully submitted,

/s/ Robert T. Gibson
Robert T. Gibson
Pro Hac Vice
THE GIBSON LAW FIRM
Four Penn Center
1600 J.F.K. Boulevard – 5th Floor
Tel: 215-729-7000
Fax: 215-695-2200

Attorney for Creditors Gibson Law Firm/George
and Karen Kairis
(Objectors in *Soders v. General Motors Corp.* class
action)

Date: July 2, 2010